

DOCKET NO. UWY-CV-14-6026552-S	:	SUPERIOR COURT
	:	
NUCAP INDUSTRIES INC., ET AL.,	:	J.D. WATERBURY
Plaintiffs	:	
	:	
VS.	:	AT WATERBURY
	:	
PREFERRED TOOL AND DIE, INC., ET AL.,	:	
Defendants.	:	MAY 12, 2015

**PLAINTIFFS' REQUEST FOR EXTENSION OF TIME TO RESPOND
AND/OR OBJECT TO DEFENDANT'S INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Practice Book Sections 13-7(a)(2) and 13-10(a)(2), Plaintiffs, Nucap Industries Inc. ("Nucap Industries") and Nucap US Inc., as the successor to Anstro Manufacturing ("Nucap US") (collectively "Plaintiffs" or "NUCAP"), respectfully file this Request for an Extension of Time to file their responses and/or objections to the Interrogatories and Requests for Production of Documents of Defendants Preferred Tool and Die, Inc. ("Preferred Tool"), and Preferred Automotive Components, a division of Preferred Tool and Die ("Preferred Automotive") (collectively, "Preferred"). In support of their Request, Plaintiffs state as follows:

1. Preferred served its First Set of Requests for Production and Interrogatories on April 20, 2015 and Plaintiffs' responses and objections are due on or before May 20, 2015.
2. Preferred has previously sought two discovery extensions previously in this matter, which were granted.
3. The pleadings are not closed and the case has not been set for trial.
4. There is good cause to extend Plaintiffs' deadline to respond to Preferred's discovery requests, as Preferred has served a broad set of document requests and interrogatories that include requests for the production of Plaintiffs' confidential and trade secret materials.

5. Given both the volume and nature of the documents and information that will be captured by Preferred's discovery requests, additional time is necessary to allow Plaintiffs to fully and properly respond.

6. This is Plaintiffs' first request for an extension.

For the foregoing reasons, Plaintiffs respectfully request that Court grant their Motion and extend the time for Plaintiffs' to respond to Preferred's Interrogatories and Requests for Production by thirty (30) days, making Plaintiffs' responses and objections due on or before June 19, 2015.

PLAINTIFFS,
NUCAP INDUSTRIES, INC. and NUCAP US,
INC.

By /s/Nicole H. Najam
Stephen W. Aronson
Email: saronson@rc.com
Nicole H. Najam
Email: nnajam@rc.com
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel. No. (860) 275-8200
Fax No. (860) 275-8299
Juris No. 50604

Of counsel:
DUANE MORRIS LLP
Lawrence H. Pockers
(*Pro Hac Vice*)
Harry M. Byrne
(*Pro Hac Vice*)
30 South 17th Street

Philadelphia, PA 19103
Telephone: 215.979.1000
Fax: 215.979.1020
LHPockers@duanemorris.com
HMByrne@duanemorris.com

Attorneys for Plaintiff

CERTIFICATION

This is to certify that a copy of the foregoing was mailed, postage prepaid or delivered electronically or non-electronically, on this 12th day of May, 2015 to all counsel and self-represented parties of record, as follows:

Stephen J. Curley, Esq.
The Law Offices of Stephen J. Curley, LLC
One Atlantic Street, Suite 604
Stamford, CT 06901
scurley@earthlink.net

David A. DeBassio, Esq.
Hinckley Allen & Snyder LLP
20 Church Street
Hartford, CT 06103
ddebassio@haslaw.com

Gene S. Winter, Esq.
St. Onge Steward Johnston & Reens
986 Bedford Street
Stamford, CT 06906
gwinter@ssjr.com

/s/Nicole H. Najam

Nicole H. Najam